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October 22, 2001

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on Test Plan for C6-C10 Aliphatic Aldehydes and Carboxylic Acids

Dear Administrator Whitman:

The following comments on the test plan for C6-C10 aliphatic aldehydes and carboxylic acids are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal protection and environmental organizations have a combined membership of more than nine million Americans.

The Flavor and Fragrance High Production Volume Consortia have developed a logically circumscribed category and have presented robust summaries that adequately address each health endpoint of the SIDS battery. The Consortia have appropriately not called for any additional tests on animals. The C6-C10 aliphatic aldehydes and carboxylic acids have already been tested on many animals, and any further testing would not enhance the understanding of their generally low toxicity. Moreover, the four chemicals in this category are endogenous to humans, naturally occurring in foods, and labeled Generally Recognized as Safe by the Food and Drug Administration.

Results from the available studies of these chemicals' physicochemical properties and metabolism in humans far surpass the information that could be gleaned with the SIDS battery. Repeating the SIDS tests would not contribute anything to the understanding of the effects of the aliphatic aldehydes and carboxylic acids on human or ecological health.

We commend the Consortium's comprehensive analysis of existing data and judicious use of structure activity relationships in its test plan and robust summaries.

Thank you for the opportunity comment. I can be reached at 202-686-2210, ext. 302, or <ncardello@pcrm.org>.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist